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CLERK

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JUL 20 2012

DOUGLAS E. ARPERT  
U.S. MAGISTRATE JUDGE

July 19, 2012

The Honorable Douglas E. Arpert  
United States Magistrate Judge  
Clarkson S. Fisher Fed. Building & U.S. Courthouse  
402 East State Street  
Trenton, NJ 08608

Re: Jacobson v. Synthes, Inc., et al.  
Docket No. 11-CV-01160 (AET) (DEA)

Dear Judge Arpert:

Our office represents the plaintiff, Susan Jacobson, in connection with the above captioned matter. At this time we write to obtain a brief extension with regard to the deadlines for supplying expert reports, the taking of expert depositions and the filing of dispositive motions. Counsel for the defendant has consented to this request.

As Your Honor is aware, this matter involves a surgical plate breaking after being implanted in the plaintiff. Accordingly, a key element of this case will focus on expert reports/testimony regarding the cause of the breakage of the plate. To date, all fact discovery has been completed.

Recently, our office was advised by our experts that additional time was required to finalize their reports. Currently the Discovery Order provides the following deadlines:

1. Plaintiff's expert reports due July 20, 2012.
2. Defendant's expert reports due August 20, 2012.
3. Phone status conference September 11, 2012.
4. Expert depositions to be conducted before September 20, 2012.
5. Dispositive motions filed before October 15, 2012.

At this time, we are requesting that the Discover Order be modified as follows:

1. Plaintiff's expert reports due July 31, 2012.
2. Defendant's expert reports due August 31, 2012.
3. Phone status conference September 11, 2012.
4. Expert depositions to be conducted before September 30, 2012.
5. Dispositive motions filed before October 31, 2012.

As noted above, all parties have consented to this brief extension. As both parties will benefit from the additional time, no prejudice will result.

Thank you in advance for your consideration of this request.

Respectfully submitted,

/s/ Erik Anderson

ERIK ANDERSON

EA:klc

cc: David Covey, Esq.

7-20-2012  
So Ordered:  
J. Sent.  
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